

1 question.

2 BY MR. SEWARD:

3 Q. Is that -- do you understand my question?

4 A. I did.

5 Q. Okay. I'll go with your answer.

6 In this case, did you feel that
7 Eddie Studdard was an eminent or immediate threat to
8 cause you serious bodily injury or death at the time
9 you pulled the trigger?

10 A. Yes.

11 Q. Why?

12 A. Because we are trained on a 25 foot rule in
13 relation to bladed weapons. That someone within the
14 25 feet can get to us and injure us before we can
15 draw out weapons and pull the trigger. And so we're
16 not supposed to -- we're trained not to let someone
17 in that 25 foot threshold who has a weapon, rather
18 it's to their throat, out at us, or anything like
19 that.

20 Q. Okay. You called it the 25 foot rule. Is
21 that -- is that a written rule that Shelby County
22 Sheriff's Department has adopted?

23 A. As far as I know, yes. The research has been
24 done on it. It used to be 21 feet, but I believe
25 they've extended it in the past few years to 25 feet.

1 Q. Okay. I'm not asking you about research.
2 I'm asking you about if you know Shelby County
3 Sheriff's Department on July 7th, 2016, had a written
4 policy which states that if a suspect with any type
5 of bladed weapon in his hand gets within 25 feet of
6 you, you're authorized to use deadly force.

7 A. I don't know about policy. I know that
8 that's what we're trained.

9 Q. Who trained you?

10 A. At the academy.

11 Q. Who?

12 A. I can't tell you who had that block of
13 instruction.

14 Q. You think there's a written instruction at
15 the academy regarding what you just stated --

16 A. Yes.

17 Q. -- that supports your position?

18 A. Um-hum.

19 Q. Even if that position is correct, that
20 situation involves an officer who doesn't have his
21 gun already drawn, now does it?

22 A. Sure.

23 Q. All right. So that -- in this case --
24 because I understand if someone had a knife and they
25 charged at you and you weren't ready or had your gun

1 holstered you might be vulnerable, right?

2 A. That's why it's 25 feet, and he made it to
3 seven to ten feet because we already had your weapons
4 out.

5 Q. You had your weapons out and you had them
6 pointed right at him, right?

7 A. We did.

8 Q. How long does it take a bullet to travel ten
9 feet?

10 A. I don't know.

11 Q. A second?

12 A. I don't know. As you pointed out earlier,
13 I'm not a ballistics expert.

14 Q. All right. Well, you testified Mr. Studdard
15 was seven to ten feet away.

16 Do you find it's unusual that Deputy Reed
17 also found -- or testified that Mr. Studdard was
18 seven to ten feet away from him when he shot the
19 weapon -- his weapon?

20 A. I don't because Deputy Reed wasn't far from
21 me.

22 Q. So you don't know any of the other distances
23 involved in the shooting that day of where you were
24 in relation to anybody else, but you can testify how
25 far Mr. Studdard was away from you at the time you